

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JANE DOE, et al,

Plaintiffs,

v.

Robertson County Board of Education,

Defendant.

Case No. 3:23-cv-00605

Judge Eli J. Richardson

Magistrate Judge Alistair E. Newbern

JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES

Plaintiffs Jane Doe and John Doe as guardians and parents of C.S., a minor, (“Plaintiffs”) and Defendant Robertson County Board of Education (“RCBE”) (collectively, the “Parties”) respectfully move this Court to amend the scheduling order as proposed below. The table below shows the current deadlines as ordered by the Court, including the expected trial date. It also shows the deadline proposed by the Parties.

Deadline	Current Deadline	Proposed
Initial Disclosures	September 5, 2023	
Motions to Amend or Add Parties	February 15, 2024	April 1, 2024
Joint Status Report on Resolution and ADR	March 13, 2024	May 13, 2024
Service of written discovery	October 31, 2023	
Plaintiff’s expert disclosures	February 15, 2024	April 1, 2024
Written discovery and Depositions of fact witnesses	February 28, 2024	April 29, 2024
Motions related to fact discovery	February 1, 2024	April 1, 2024
Joint Status Report on case resolution	March 13, 2024	May 13, 2024

Defendant's expert disclosures	March 29, 2024	May 1, 2024
Expert depositions	May 31, 2024	June 17, 2024
Dispositive motions	July 1, 2024	August 1, 2024
Motions in limine and objections to experts	November 18, 2024	November 18, 2024
Joint proposed pre-trial order	November 25, 2024	November 25, 2024
Pretrial conference	December 2, 2024	December 2, 2024
Jury trial	December 10, 2024	December 10, 2024

The Parties are seeking these extensions in good faith to pursue alternative dispute resolution, and not for reasons of delay. The proposed changes still comply with Local Rule 16.01(h)(1).

Respectfully submitted,

/s/ Sara Naylor

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CERTIFICATE OF SERVICE

I hereby certify that the following was served via the Court's ECF system on January 29, 2024 to the following:

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